

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

KARIM P. NAJJAR, *et. al.*, individually and behalf of all others similarly situated,

Plaintiffs,

v.

RIAD SALAMEH, *et al.*,

Defendants.

Civil Action No. 1:24-cv-05043-CPO-EAP

**STIPULATION AND [PROPOSED] ORDER EXTENDING TIME  
TO FILE PRE-MOTION LETTERS REQUESTING A PRE-MOTION CONFERENCE  
IN ADVANCE OF THEIR MOTIONS TO DISMISS THE  
FIRST AMENDED CLASS ACTION COMPLAINT**

Plaintiffs Karim P. Najjar, Halim Abou-Faycal, Younes Bazzi, Jacques Fontaine, Mounir Jermany, Ibrahim Khreibani, Bechara Rizk, Samar Shami, Joseph Tleiji, Salim Tleiji and Ramzi Zibaoui (“Plaintiffs”), individually and on behalf of a proposed class of similarly situated persons, and Defendants BDO USA, P.C., Deloitte LLP, Deloitte & Touche LLP, and Ernst & Young U.S. LLP (collectively, “US Defendants”), submit this joint stipulation, subject to the approval of the Court, by and through their undersigned counsel and pursuant to Civil Local Rule 6.1 and Sections II and VIII of Your Honor’s Judicial Preferences, as follows:

1. WHEREAS, on April 17, 2024, Plaintiff Najjar filed a Class Action Complaint against the US Defendants and other defendants in the above-captioned action;
2. WHEREAS, on July 24, 2024, Plaintiffs filed a First Amended Class Action Complaint against the US Defendants and other defendants in the above-captioned action;

3. WHEREAS, the US Defendants preserve and have not waived any applicable defenses, including those pursuant to Federal Rule of Civil Procedure 12(b), such as lack of jurisdiction;

4. WHEREAS, counsel for Plaintiffs and counsel for the US Defendants have met and conferred and, subject to the Court's approval, agreed to extend the time within which the US Defendants may file letters requesting a pre-motion conference in advance of their motions to dismiss the First Amended Class Action Complaint;

5. WHEREAS, no prior extension of time has been sought by the parties to this stipulation;

6. THEREFORE, it is hereby stipulated and agreed that:

a) The deadline for the US Defendants to file letters requesting a pre-motion conference in advance of their motions to dismiss the First Amended Class Action Complaint is extended to and including **October 7, 2024**.

**SO ORDERED.**

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Hon. Christine P. O'Hearn, U.S.D.J.

Dated: \_\_\_\_\_

Dated: August 14, 2024

By: /s/ James E. Cecchi

James E. Cecchi  
**CARELLA, BYRNE, CECCHI,  
BRODY & AGNELLO, P.C.**  
5 Becker Farm Road  
Roseland, New Jersey 07068  
Telephone: (973) 994-1700  
jcecchi@carellabyrne.com

Charles J. LaDuka\*  
Daniel M. Cohen\*  
Monica Miller\*  
**CUNEO GILBERT & LADUCA, LLP**  
4725 Wisconsin Ave NW, Suite 200  
Washington, DC 20016  
Telephone: 202-789-3960  
charles@cuneolaw.com  
daniel@cuneolaw.com  
monica@cuneolaw.com

Robert K. Shelquist\*  
Rebecca A. Peterson\*  
**LOCKRIDGE GRINDAL NAUEN PLLP**  
100 Washington Avenue South,  
Suite 2200  
Minneapolis, Minnesota 55401  
Telephone: 612-339-6900  
rkshelquist@locklaw.com  
rapeterson@locklaw.com

John W. (“Don”) Barrett\*  
Katherine Barrett Riley\*  
**BARRETT LAW GROUP, P.A.**  
P.O. Box 927  
404 Court Square North  
Lexington, Mississippi 39095  
Telephone: (662) 834-2488  
donbarrettpa@gmail.com  
kbriley@barrettlawgroup.com

*Counsel for Plaintiffs and the Proposed  
Classes*  
\* To be admitted pro hac vice

Respectfully Submitted,

By: /s/ David Kiefer

David Kiefer  
Gregory G. Ballard\*  
Fabiola Vega\*  
\**pro hac vice* to be sought  
**MCDERMOTT WILL & EMERY LLP**  
One Vanderbilt Avenue  
New York, NY 10017-3852  
Telephone: (212) 547-5400  
dkiefer@mwe.com  
gballard@mwe.com  
fvega@mwe.com

*Attorneys for Defendant BDO USA, P.C.*

By:

/s/ William R. Maguire

William R. Maguire\*  
Carl W. Mills\*  
\**pro hac vice* to be sought  
**HUGHES HUBBARD & REED LLP**  
One Battery Park Plaza  
New York, NY 10004  
Telephone: (212) 837-600  
bill.maguire@hugheshubbard.com  
carl.mills@hugheshubbard.com

*Attorneys for Defendant Ernst & Young  
U.S. LLP*

By:

/s/ Michael Martinez

Michael Martinez  
Michael J. Dell\*  
Tobias B. Jacoby\*  
\**pro hac vice* to be sought  
**KRAMER LEVIN NAFTALIS &  
FRANKEL LLP**  
1177 Avenue of the Americas  
New York, NY 10036  
Telephone: (212) 715-9100  
mdell@kramerlevin.com

*Attorneys for Defendants Deloitte LLP and  
Deloitte & Touche LLP*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 14th day of August, 2024, a true and correct copy of the foregoing document was served by CM/ECF to the parties registered to the Court's CM/ECF system.

/s/ David Kiefer